

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

JEFFREY ROTHMAN

PLAINTIFF

CIVIL No. 19-0225 (CM) (OTW)

vs

THE CITY OF NEW YORK, etc.,
et al.,

DEFENDANTS

DECLARATION OF JEFFREY A. ROTHMAN

JEFFREY A. ROTHMAN declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the following is true and correct:

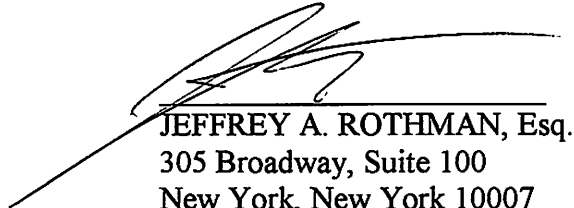
I am the Plaintiff in this action. As such, I am fully familiar with all of the facts stated below, and all of the facts and circumstances of this action. This declaration is made in support of Plaintiff's motion requesting that the Hon. Chief Judge Colleen McMahon disqualify herself from further presiding over this matter.

1. I was admitted to practice in this Court in August of 2003. Since 2004 I have operated a solo civil rights practice focused primarily upon challenging law enforcement misconduct. According to PACER I have been counsel for plaintiff or plaintiffs in 211 cases in this district alone. Prior to the present application, I have never before – in this or in any other court – made an application seeking a Judge's disqualification.

2. In all of the cases I have handled before this Court and all other courts, I have never encountered a circumstance where a judge has ordered that no interrogatories would be permitted. In all of the cases I have handled before this Court and all other courts, I have never encountered a circumstance where a judge has ordered that no document requests would be permitted. In all of the cases I have handled before this Court and all other courts, I have never encountered a circumstance where a judge has ordered that no depositions would be permitted. Nor have I ever encountered, in any of the cases I have come across through my legal research, or through communications with my colleagues, or otherwise, a case where a judge has ordered that no interrogatories, or no document requests, or no depositions would be permitted in the litigation of a case.

Dated: New York, New York
June 7, 2020

Respectfully submitted,



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